

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

JANE DOES 1-9,

Plaintiffs,

vs.

COLLINS MURPHY et. al.,

Defendants.

Case No.: 7:20-CV-00947-DCC

JANE DOE,

Plaintiff,

vs.

COLLINS MURPHY et. al.,

Defendants.

Case No.: 7:21-CV-03193-DCC

JANE DOE 1 et. al.,

Plaintiffs,

vs.

COLLINS MURPHY et. al.,

Defendants.

Case No.: 7:22-CV-03576-DCC

PLAINTIFFS' STATUS REPORT

In accordance with the Court's request, the Plaintiffs in Jane Does 1-9 v. Murphy et al., Jane Doe v. Collins Murphy, et al. and Jane Doe 1 v. Murphy et al. submit the following Status Report updating the Court on the progress concerning the litigation and discovery.

I. DISCOVERY

A. Limestone University Discovery of Plaintiffs

On March 22, 2021, Defendant Limestone University served their First Set of Requests for Production on Plaintiffs. On July 23, 2021 Plaintiffs provided written responses to Defendant Limestone's Interrogatories and documents responsive to Defendant Limestone's Request for Production.

B. Pornhub's Discovery of Plaintiffs

On June 18, 2021, Defendants served Plaintiffs with their First Set of Requests for Production, Interrogatories, and Requests to Admit. Plaintiffs provided their responses to Defendants Requests to Admit on August 17, 2021. On August 27, 2021, Plaintiffs provided their responses to Defendants Requests for Production and Interrogatories.

On April 4, 2022, Defendants served Plaintiffs with notices for their deposition.

C. Plaintiffs' Discovery of Pornhub

Plaintiffs served their first set of discovery on Defendants in March of 2021. On April 18, 2021, Defendants largely objected citing foreign laws governing the dissemination of information to the United States, among other objections. Defendants supplemented their responses to Plaintiffs' first set of discovery six months after being served on September 03, 2021. However, MindGeek only provided limited information.

On September 23, 2022, Plaintiffs served Defendant Pornhub with a 30(b)(6) deposition notice. On October 28, 2021, Plaintiffs served Defendants with a second set of Request for Production. On November 17, 2022, Defendants objected to Plaintiffs notice of deposition on the grounds that it was overbroad and sought information that was not relevant to plaintiffs claims and outside the scope of Discovery. Defendants largely objected, and provided limited responses on

November 18, 2022, four days after filing their Motion to Dismiss, rendering any efforts by Plaintiff to further their efforts futile.

On October 19, 2022, Plaintiffs served MindGeek with their third set of discovery.

On February 3, 2023, Plaintiffs' counsel received an Email from defense counsel with criticism of proposed discovery schedule since dispositive motions and stay motions are pending.

On October 10, 2023, Plaintiffs' counsel served a Deficiency letter on Defendants Pornhub regarding discovery production.

On October 11, 2023, Defendant Pornhub served a letter outlining their objections to Plaintiffs' Deposition Notice and the availability of identified corporate representatives for depositions.

On October 19, 2023, Plaintiffs took the deposition of corporate rep produced by Defendants Pornhub, Graham Collie.

On November 7, 2023, Plaintiffs served a Deficiency letter on Defendants Pornhub regarding discovery production. On November 15, 2023 – MG produces 321 pages of documents by letter, no corresponding supplemental pleading.

On November 27, 2023, Plaintiffs served a Deficiency letter on Defendants Pornhub regarding discovery production.

On November 29, 2023, Plaintiffs served a Deficiency letter on Defendants Pornhub regarding discovery production. On November 29, 2023 – MG produces 221 pages of documents by email, no corresponding supplemental pleading.

On December 8, 2023, Plaintiffs' counsel served a Deficiency letter on Defendants Pornhub regarding discovery production.

On December 27, 2023, Plaintiffs, counsel served a Deficiency letter on Defendants Pornhub regarding discovery production.

On January 4, 2024, Defendants Pornhub produces approximately 448 pages of documents, narrowly limited in scope and nonresponsive to previous requests and meet and confer.

On January 9, 2024, Plaintiffs served a Deficiency letter on Defendants Pornhub regarding discovery production.

On January 12, 2024, Defendants served Plaintiffs with a letter responding to Plaintiffs deficiency letter dated January 9, 2024.

D. Plaintiffs' Discovery of Limestone University

On January 14, 2021, Plaintiffs served their First Set of Requests for Production and Interrogatories on Defendant Limestone University. On March 9, 2021, Defendant Limestone University produced documents responsive to Plaintiffs First Set of Requests for production. On April 8, 2021, Defendant Limestone University produced responsive written answers to Plaintiffs First Set of Interrogatories.

E. Plaintiffs' Discovery of Collins Murphy

On September 13, 2023, Plaintiffs took the deposition of Defendant Collins Murphy.

F. Plaintiffs' Discovery of xHamster

On October 12, 2023, Plaintiffs served their Notice of Request to take 30(b)(6) deposition on Defendant xHamster.

On October 17, 2023, Plaintiffs took the deposition of corporate rep produced by Defendant xHamster, Nikita Popov.

On November 15, 2023, Plaintiffs served their First Set of Interrogatories and Requests for production on Defendants xHamster.

On December 14, Defendant xHamster requested an extension to respond to discovery, making the new deadline January 6, 2024. To date, Plaintiffs have not yet received responses to the discovery requests.

G. Plaintiffs Discovery of Third Parties

On May 5, 2021, Plaintiffs subpoenaed SR& I Pre-employment Services LLC for document production.

On November 2, 2023, Plaintiffs subpoenaed Alderson Broaddus University for document production.

II. Anticipated Discovery

At this time, Plaintiffs and Defendants Pornhub are in the process of scheduling the deposition of additional corporate representatives regarding the areas outlined within Plaintiffs 30(b)(6) deposition notice.

Additionally, it can be anticipated that the depositions of each Plaintiff will need to be conducted by Defendants. Additionally, Defendants have expressed desire to perform IMEs of each Plaintiff. The Parties are currently discussing the particulars regarding the IMEs in an attempt to reach an agreement regarding the same.

Further, Plaintiffs and Defendants Limestone have discussed the need of specific fact witness depositions which are anticipated to be completed.

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Respectfully submitted,

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